

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Public Inquiry on Modification of Service
Performance Measurement Plan

Docket No. PI2022-3

PUBLIC REPRESENTATIVE COMMENTS

(May 18, 2022)

I. INTRODUCTION

The Public Representative hereby responds to Order No. 6159¹ which is in response to a Postal Service Request² to modify their current Service Performance Measurement (SPM) system. In that order, the Commission initiated this proceeding and asked interested persons to comment on “the Postal Service’s proposed revisions to its SPM Plan.” Order No. 6159 at 2. The Commission further reminded interested persons that the scope of this docket is limited to the Postal Service’s proposed revisions to the SPM Plan and not a platform to comment on any underlying service standard changes. *Id.* The Postal Service filed its Request pursuant to 39 C.F.R. § 3055.5. Request at 1.

II. BACKGROUND

¹ Notice and Order Initiating Proceeding to Consider Modifications to Market Dominant Service Performance Measurement Plan, April 26, 2022 (Order No. 6159).

² United States Postal Service Notice of Filing Changes to Service Performance Measurement Plan Document, April 22, 2022 (Request).

On July 5, 2018, in Docket No. PI2015-1, the Commission approved the current internal SPM systems.³ Since then, the Postal Service has filed multiple modifications. On September 20, 2018, in Docket No. PI2018-2, the Postal Service filed a modification to the SPM systems to reflect changes in “the actual service and operational capabilities of the Postal Service network.”⁴ On November 5, 2018, the Commission conditionally approved the proposed modification to the SPM systems and directed the Postal Service to file a revised SPM plan to address a number of concerns identified in Order No. 4872.⁵ On December 27, 2018, after the Postal Service filed a revised SPM plan and addressed the concerns regarding the description of the measurement system for First-Class Mail International, the Commission closed Docket No. PI2018-2. On May 21, 2019, in response to Order No. 4945, the Postal Service filed a modification that included the removal of references to the legacy external SPM system, a proposal to replace external SPM with internal SPM for two First-Class Mail International services and the Return Receipt (Green Card) service, and a request to use domestic SPM data as a proxy for certain aspects of international letters and flats service performance.⁶ Most recently, on August 31, 2021, the Postal Service filed a modification intended to include reporting for Three-Day, Four-Day, and Five-Day service standards for First-Class Mail in place of just the Three-to-Five-Day service standard and replace certain

³ Docket No. PI2015-1, Order Approving Use of Internal Measurement Systems, July 5, 2018 (Order No. 4697). See *also* Docket No. PI2015-1, Errata to Order No. 4697, August 21, 2018 (Order No. 4771).

⁴ Docket No. PI2018-2, United States Postal Service Notice of Service Performance Measurement System Modification, September 20, 2018, at 1.

⁵ Docket No. PI2018-2, Order Conditionally Approving Modification to Market Dominant Service Performance Measurement Systems, November 5, 2018, at 4-11 (Order No. 4872).

⁶ Docket No. PI2019-1, United States Postal Service Response to Order No. 4945 and Request for Approval of Service Performance Measurement System Modification, May 21, 2019, at 1.

references to external SPM with internal SPM.⁷ The Commission approved these changes on September 28, 2021.⁸

III. COMMENTS

The Postal Service's Request in this docket identifies three material changes to the current SPM system. First, a revision to how the long haul exception impacts "Start-the-Clock" events. Second, the inclusion of Reply Mail in the measurement of Single-Piece First-Class Letters/Cards/Flats. Third, a revision to the critical entry time (CET) applicable to Periodicals. Request at 1.

In addition to filing their Request, the Postal Service filed an accompanying Library Reference.⁹ This Library Reference contained three PDF documents; USPS_Preface_PI2022-3_LR1 – 4-21-22.pdf (Preface), iSPM_RevPlan_BLACK-LINE – 4-21-22.pdf (Blackline), and iSPM_RevPlan_RED-LINE – 4-21-22.pdf (Redline). The Redline document shows all the changes the Postal Service is making from the previous iteration and the Blackline document presents what these changes will appear as if approved.

1. The Long Haul Exception Impacting "Start-the-Clock" Events

The Postal Service states that a high percentage of Presort First-Class Mail is excluded from service measurement due to a long-haul exclusion. The reason for this exclusion being that when the Postal Service transports mail from a mailer facility to a Postal Service facility that is not in the same District, the Postal Service is unable to

⁷ Docket No. PI2021-3, United States Post Service Notice of Filing Changes to Service Performances Measurement Plan Document, August 31, 2021, at 1-2.

⁸ Docket No. PI2021-3, Order Approving Modifications to Market Dominant Service Performance Measurement Systems and Closing Docket, September 28, 2021. (Order No. 5989)

⁹ Library Reference USPS-LR-PI2022-3-1 – Revised USPS Service Performance Measurement Plan, April 22, 2022.

accurately determine the date and time of when the Postal Service took possession of the mail. Request at 3. To address this, the Postal Service states it will implement a scanning solution at impacted mailer locations to capture when all relevant trailers/containers depart from mailer facilities. Id.

The Public Representative believes this is a good step in the right direction to ensure more measured mail and to provide the best information possible. The only qualm is with the use of “impacted mailer locations” rather than a broader attempt to provide all mailer locations with improved technologies. The Public Representative commends the Postal Service for identifying a recurring problem and implementing a solution. Hopefully the Postal Service sees success with this measure and will seek to further leverage technology to capture information and improve their tracking capabilities. The Public Representative concludes that the Postal Service has completed their desired task.

2. Inclusion of Reply Mail in Service Performance Measurement

The Postal Service states that through internal measurement enhancement initiatives, they have developed the ability to track Reply Mail and thus will now be including Reply Mail in measurement as part of Single Piece First Class mail. Request at 2-3. Reply Mail has been excluded from measurement since 2010 on account of a Commission granted exception.¹⁰ The Public Representative notes as a clarification to the reader that this change applies to domestic only. The Public Representative concludes that the Postal Service has completed their desired task.

¹⁰ The Postal Service elaborates in footnote 5 of their request: “Pursuant to 39 CFR part 3055.3, the Commission granted the Postal Service’s request to exempt Business Reply Mail from annual and periodic reporting requirements for service performance achievements under the semi-permanent business exception in 2010. See Order No. 531, Order Concerning Postal Service Request for Semi-Permanent Exceptions from Periodic Reporting of Service Performance Measurement, Docket No. RM2010-11 (Sep. 3, 2010).”

3. Revision of the Critical Entry Time (CET) Applicable to Periodicals

The Postal Service states that it has as many as five different CETs for Periodicals and that results in inefficient mail processing operations and inconsistent, unreliable service. Request at 4. The Postal Service updates their Table 10-1 on page 72 of the Redline and page 64 of the Blackline. The Public Representative notes that the Postal Service changed all Periodicals CETs to 0800 except for Non-FSS No Bundle Sort Required Pure Carrier Route Pallet, which it left at 1700. See below:

Image 1: Periodicals CET Changes

Periodicals (Origin and Destination)	FSS	No Bundle Sort Required 5-Digit/Scheme Container	N/A	N/A	1400 0800	N/A
		Bundle Sort Required 3-Digit and Up Container	N/A		0800	
	Non-FSS	No Bundle Sort Required 5-Digit/Scheme Container	N/A	N/A	1400 0800	N/A
		No Bundle Sort Required Pure Carrier Route Pallet	N/A		1700	
		Bundle Sort Required 3-Digit and Up Container	N/A		1400 0800	

Table 10-1: National Critical Entry Times

Source: Redline at 72.

The Public Representative notes that the Postal Service did not specify that they were changing all CETs for Periodicals, but instead were only seeking the implementation of a more uniform CET. Request at 4. If the Postal Service intended to make this change, then they should file an amended SPM Plan reflecting the change. If not and the document is correct, then the Public Representative concludes that the Postal Service has completed their desired task.

The Public Representative does wonder what unintended consequences, if any, this will have on Periodicals mailers. Will the Periodical mailers be able to adjust to the new times? Did the Postal Service take steps to get stakeholder feedback before making these changes? The Public Representative encourages the Commission to explore this but recognizes that it may be out of the scope of this docket.

4. Miscellaneous Observations and Comments by the Public Representative

The Public Representative observes one potential error in the SPM Plan that while does not affect the Postal Service's stated and desired changes, should be addressed. On page 48 of the Redline and page 47 of the Blackline, the Postal Service states "Reference Section 10.3 for more information on Critical Entry Times." See below:

Image 2: Referencing Section 10.3

3. *Plant Load Using (Detached Mail Unit) Postal Transportation*
- 3.1. *Critical Entry Time.* The CET is determined by mail class. For First-Class Mail, CET varies based on the container preparation, induction method, entry location type, and Customer/Supplier Agreement. For Periodicals Mail, the CET varies based on the container preparation and the destination ZIP Code (FSS vs. Non-FSS). Reference Section 10.3 for more information on Critical Entry Times.

Source: Redline at 48.

The Public Representative's issue here is that when he goes to reference Section 10.3, he finds a section that discusses Stop-the-Clock and Last Mile Delivery Factor. See below:

Image 3: What the Public Representative Sees

10.3 "Stop-the-Clock"

The "Stop-the-Clock" event for service measurement of single-piece mail is established using the delivery scan event of randomly sampled mailpieces.

The "Stop-the-Clock" event for service measurement of commercial mail is established using the last

Source: Redline at 66-67.

It is in Section 10.7 that the Postal Service has a table showing National Critical Entry Times. The Public Representative is curious if a number was transposed or if he misunderstood the contents of Section 10.3.

Ultimately, the contents of this modification achieve what the Postal Service stated it wanted to do. There are no major issues that give the Public Representative pause. If the Postal Service can clarify some of the minor confusion mentioned in these comments by the Public Representative, then the Public Representative has no problem encouraging the Commission to approve this modification.

IV. CONCLUSION

The Public Representative respectfully submits the foregoing comments for the Commission's consideration.

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